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Fort Lesley J. McNair
Consolidated Utility Systems Privatization
Environmental Assessment

March, 2000

Attachment to Request For Proposal
for the Privatization of the
National Capital Region
Utility Distribution and Collection Systems
Solicitation DACA31-00-R-0026

Note: This file includes text only for the Draft Environmental Assessment for the Ft. McNair UDC Systems Privatization. Information for Appendix A – Agency Coordination, Appendix B – General Installation Maps, and Appendix C – UDC System Maps is provided as a separate file attachment to this Solicitation.

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EXECUTIVE SUMMARY

Introduction

This Environmental Assessment (EA) examines the proposed privatization of selected utility distribution and collection (UDC) systems at Fort Lesley J. McNair, Washington, D.C., following the Department of Defense (DoD) and Department of the Army (DA) directives and guidance to military installations. DoD and DA envision that the Government will be able to divest itself of the ownership and responsibility to operate and maintain UDC systems on military installations by contracting with a non-Federal entity. The Military District of Washington (MDW) has decided to pursue this privatization initiative by grouping selected UDC systems at each of its five installations in the National Capital Region (NCR), and combining all grouped systems into one public solicitation. At Fort McNair, the utilities selected for the grouped contract are the electric, natural gas, water and wastewater (McNair UDC) systems. MDW's decision to group the NCR UDC systems for privatization is the result of preliminary market research and conditions inventories at each of the five installations. These investigations have led to the conclusion that the responsibility to own, operate, and maintain unprofitable or marginally profitable systems would not be enticing to a non-Federal entity without proper incentives. The best incentive that MDW has envisioned, maximizing the extent of privatization, is to group all types of UDC systems from a number of locations into one package that combines the more potentially profitable utility systems with the less potentially profitable systems.

Actions Analyzed

Four alternatives were considered for this project. Alternatives for the proposed action include (1) Out-source Operation and Maintenance of the McNair UDC Systems, (2) Privatization Restricted to the Current Alignments of the McNair UDC Systems, (3) Unrestricted Privatization of the McNair UDC Systems, and (4) the No-Action Alternative.

Alternative 1 would outsource the operation and maintenance of the McNair UDC systems. The Government would retain ownership of the real property infrastructure and would continue to be responsible for any capital improvements to the systems. Adoption of Alternative 1 would not satisfy the need to provide immediate and future capital improvements to UDC systems in poor condition, nor would it fully comply with DoD and DA policy to divest Government ownership and operation of these systems.

Alternative 2 would privatize the McNair UDC systems by means of fee simple transfer of current real property infrastructure to the non-Federal entity via a Bill of Sale or deed transaction. Additionally, an easement would be granted to the same entity for means of access along the current utility alignments, and a 10 to up to 50-year utility services contract would be awarded to transfer responsibility for maintenance and operation of these systems from the Government to the successful non-Federal entity. Adoption of Alternative 2 would restrict the non-Federal entity from proposing infrastructure construction and improvement activities outside the limits of the easement granted; therefore, no new work could be conducted on lands that potentially have not already or recently been disturbed by human activities. It should be noted

that adoption of Alternative 2 would allow the non-Federal entity to proceed expeditiously with infrastructure improvement activities within the limits of the easements to be granted upon contract award. However, possible monetary and operational efficiencies that could be achieved by the realignment of obsolete utility lines would not be realized. The potential benefit of initial project timesaving is not expected to outweigh these considerable opportunity costs.

Alternative 3 would privatize the McNair UDC systems as in Alternative 2 above, except that no restrictions would be placed on the non-Federal entity to propose infrastructure construction or improvement activities outside the limits of easements to be granted for existing UDC systems. The non-Federal entity would be responsible to operate and maintain the UDC systems to industry or other standards as prescribed in the utility service contract. Should the non-Federal entity propose to replace part or all of an existing UDC system or systems, by realignment or relocation outside of the easement to be granted at contract award, the non-Federal entity would be responsible for all associated environmental compliance, permits, installation approvals, and local regulatory requirements. The non-Federal entity must fund these associated activities and complete them prior to initiation of any physical work. Adoption of Alternative 3 would allow the most unrestricted competition among offerors, encouraging the submission of proposals with the most efficient and cost-effective infrastructure improvement plans to serve the current and expected installation utility service needs. As Alternative 3 best positions MDW to be able to pursue DoD and DA UDC system privatization goals, it is designated as the preferred action alternative.

Alternative 4, the no-action alternative, is the baseline against which the proposed action was evaluated, as prescribed by Council on Environmental Quality (CEQ) regulations. The baseline established to evaluate the environmental and socioeconomic effects of the proposed action would be the conditions at Fort McNair in the absence of the proposed action. Adoption of the no-action alternative would continue the Government's present ownership and responsibilities to operate and maintain the existing UDC systems. Maintenance and operational trends would most likely remain the same. This alternative would not satisfy the need to provide near-term capital improvements to existing systems in poor condition, nor would it comply with DoD and DA policy on obtaining cost-effective and efficient utility services. Therefore, this alternative is not preferred.

Environmental and Socioeconomic Consequences

Table ES-1 shows the expected impacts for the preferred action and no-action alternatives analyzed in detail in this EA. The following paragraphs provide additional information on expected impacts. The proposed action to privatize the ownership, operation and maintenance of the McNair UDC systems would not be expected to have any significant adverse effects on any environmental resources or socioeconomic conditions on this installation. Furthermore, the proposed action would not be expected to significantly change the overall mission of Fort McNair, or by itself lead to an increase, decrease, or change in the number or types of tenants on the installation.

Granting utility easements and transferring the real property infrastructure would be expected to result in minimal cumulative physical, biological or chemical effects on any resource of the installation, and on installation command or mission. The only foreseeable effects of the proposed action on these resources are secondary and short-term, specifically as a result of potential future excavation and construction activities by the non-Federal entity or its subcontractors that would be associated with repairing, upgrading or constructing new UDC systems. The following segments address these potential effects.

Potential utility infrastructure improvements, including expansion, repair or upgrade of the UDC systems, would most likely have minimal impact on air, land and water resources. These effects are not likely to be large, either singly or cumulatively. Additionally, restrictions and conditions incorporated into the easement would require special care and responsibilities for environmentally sensitive areas, mitigating any foreseeable impacts to (1) water supply and quality, (2) prime farmland soils, (3) forest conservation areas, (4) aquatic resources, (5) wetlands, (6) threatened and endangered species, and (7) cultural resources. This reduction of the impact of each part of the proposed action would reduce the overall cumulative impact of all foreseeable activities within reasonable limits. The non-Federal entity would be responsible for ensuring that future construction, maintenance, and upgrades of the utilities comply with all applicable Federal and state environmental laws and regulations.

Regulatory Requirements

Compliance with Federal environmental regulations would be required before the project analyzed in this EA could be initiated. The status of environmental compliance for the installation is summarized in Table ES-2.

Conclusions

Upon reviewing the EA and other information, implementing the preferred alternative for the proposed action addressed in this EA would not significantly alter baseline environmental or socioeconomic conditions. Because the proposed action would not have a significant effect on the quality of the human environment, no environmental impact statement will be prepared, and a Finding of No Significant Impact will be published in accordance with 40 Code of Federal Regulations (CFR) 1500 and Army Regulation (AR) 200-2.

Table ES-1: Summary of Effects of the Proposed Action and the No-Action Alternative

Resource	Proposed Action	No-Action Alternative
Land Use	No Impact.	No Impact.
Geology	No Impact.	No Impact.
Soils	No Impact.	No Impact.
Topography and Drainage	No Impact.	No Impact.
Climate	No Impact.	No Impact.
Air Quality	No Impact.	No Impact.
Water Quality	No Impact.	No Impact.
Aquatic Resources and Wetlands	No Impact.	No Impact.
Vegetation	No Impact.	No Impact.
Wildlife Resources	No Impact.	No Impact.
Threatened and Endangered Species	No Impact.	No Impact.
Prime and Unique Farmlands	No Impact.	No Impact.
Wild and Scenic Rivers	No Impact.	No Impact.
Cultural Resources	No Impact.	No Impact.
Hazardous, Toxic and Radioactive Substances	No Impact.	No Impact.
Infrastructure	No Impact.	No Impact.
Solid Waste	No Impact.	No Impact.
Transportation	Temporary, minor impacts.	No Impact.
Economics	Minor impacts.	No Impact.
Public Health and Safety	No Impact.	No Impact.
Noise	No Impact.	No Impact.
Environmental Justice	No Impact.	No Impact.

Table ES-2. Compliance with Federal Environmental Statutes and Executive Orders[a]

Acts	Compliance[b]
Anadromous Fish Conservation Act	FULL
Clean Air Act, as amended (Public Law 88-206)	FULL
Clean Water Act, as amended (Public Law 95-217)	FULL
Coastal Barrier Resources Act	FULL
Coastal Zone Management Act	FULL
Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986	FULL
Endangered Species Act of 1973, as amended (Public Law 93-205)	FULL
Estuary Protection Act	FULL
Federal Water Project Recreation Act	FULL
Fish and Wildlife Coordination Act, as amended (16 United States Code [U.S.C.] 661, et seq.)	FULL
Land and Water Conservation Fund Act	FULL
Marine Mammal Protection Act	FULL
Magnuson Fishery Conservation and Management Act, as amended (Public Law 94-265)	FULL
National Environmental Policy Act of 1969 (Public Law 91-190)	Ongoing
National Historic Preservation Act of 1966, as amended (Public Law 89-665)	Ongoing
Noise Control Act of 1972, as amended	FULL
Resource Conservation and Recovery Act (Public Law 94-580)	FULL
Rivers and Harbors Act	FULL
Safe Drinking Water Act, as amended (Public Law 93-523)	FULL
Solid Waste Disposal Act of 1965, as amended	FULL
Toxic Substances Control Act of 1976 (Public Law 94-469)	FULL
Watershed Protection and Flood Prevention Act of 1954 (16 U.S.C. 1101, et seq.)	FULL
Wetlands Conservation Act (Public Law 101-233)	FULL
Wild and Scenic Rivers Act	FULL

[a] Applies to all alternatives.

[b] Ongoing--Some requirements of the regulation remain to be met before implementing some activities. Full compliance is expected.

TABLE ES-2, continued
Compliance with Federal Environmental Statutes and Executive Orders[a]

Executive Orders	
Flood Plain Management (Executive Order 11988)	FULL
Protection of Wetlands (Executive Order 11990)	FULL
Federal Compliance with Pollution Standards (Executive Order 12088)	FULL
Environmental Justice in Minority Populations and Low-Income Populations (Executive Order 12898)	FULL
Invasive Species (Executive Order 13112)	FULL

[a]Applies to all alternatives.

[b]Ongoing--Some requirements of the regulation remain to be met before implementing some activities. Full compliance is expected.

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Tables and Figures

1.0 PURPOSE, NEED AND SCOPE

1.1 Background

The great majority of the nation's military installations contain Government owned, operated and maintained utility distribution and collection (UDC) systems. In many instances, funding for maintenance and operation of UDC systems has not kept pace with the functional needs of these systems, especially those that have exceeded or are now approaching the end of their expected useful life. Privatization of the UDC systems on military installations entails the transfer of infrastructure ownership, operation, maintenance, repair and replacement responsibilities from the Government to a private or public sector utility services provider. Privatization of the UDC systems is envisioned as the means for the military services to obtain the most efficient and effective delivery of utility services to standards applicable and prescribed for systems in the private sector. Privatization of UDC systems would allow the military services to redirect specific manpower resources to meet the critical needs of its core war fighting, training, support, and readiness missions.

Congressional legislation and subsequent Department of Defense (DoD) Defense Reform Initiatives Directives (DRIDs) and Department of the Army (DA) implementation policies directed that military installations pursue privatization of all their UDC systems. Enacted in November 1997, the National Defense Authorization Act for Fiscal Year 1998 (10 U.S.C. 2688) provided authority to the Secretary of a military department to convey a utility system, or part of a utility system, under the jurisdiction of the Secretary, to a municipal, private, regional, district, or cooperative utility company or other entity. The conveyance may consist of all right, title and interest of the United States in the utility system or such lesser estate, as the Secretary considers appropriate, to serve the interests of the United States. DoD issued Defense Reform Initiative Directive (DRID) #9, Privatizing Utility Systems, on 10 December 1997. DRID #9 directed the military services to develop plans to privatize all applicable UDC systems by 1 January 2000. In subsequent DRID #49, issued on 23 December 1998, DoD relaxed the privatization deadline to 2003 for the great majority of military installations where privatization efforts had not yet been undertaken. Exceptions were strictly limited to those cases where a particular UDC system must be maintained for unique national security reasons or where privatization of a particular UDC system is ultimately determined to be uneconomical.

Following DA policy for implementing these DRIDs, the U.S. Army Military District of Washington (MDW) is seeking to privatize thirteen (13) selected UDC systems at its five (5) installations in the National Capital Region (NCR) by the end of September 2000. MDW's five installations in the NCR are Fort Lesley J. McNair, located in Washington, D. C.; Fort George G. Meade, located in Maryland; and Fort Myer, Fort Belvoir, and Fort A.P. Hill, all located in Virginia. Importantly, Fort Lesley J. McNair and Fort Myer, although in two different governmental districts, are in close proximity in the Washington D. C. metro area. As a result, many activities at these two installations are jointly managed, and resources are shared to enjoy economies of scale on a variety of activities, including facilities planning and management. They form the Fort Myer/McNair Military Community (FMMC).

This Environmental Assessment (EA) was prepared to address the environmental and socioeconomic impacts of the proposed action to privatize, as a group, the electric, natural gas, water and wastewater UDC systems at Fort Lesley J. McNair (McNair UDC systems). Fort McNair is located in southwestern Washington, D. C., one-mile south of the U. S. Capitol building. The installation is situated on Greenleaf Point at the confluence of the Anacostia River and the Washington Channel of the Potomac River. The main entrance is located at the corner of 4th and P Streets. The installation currently encompasses an area of approximately 100 acres. A map, depicting the general location of Fort McNair, is provided at Appendix B, Figure 1: Location of Fort McNair. A more specific, larger scale map of the installation is provided at Appendix B, Figure 2: Installation Map.

1.2 Purpose of and Need for the Proposed Action

The purpose of the proposed action is to transfer utility infrastructure ownership from the Federal Government to a non-Federal entity, conveying responsibility to renovate, repair, replace, operate and maintain these systems to prescribed industry standards, common in the private sector. The physical condition of one or more of the UDC systems at Fort McNair is such that all or parts of the systems are approaching or have exceeded their expected useful life. Funding for maintenance, repair and upgrade of these systems provided by DA over the years has generally not kept pace with the need to adequately maintain the infrastructure integrity and reliability of these systems.

MDW seeks to implement the proposed action by means of best value competitive award of a contract to a successful, non-Federal offeror. The utility service contract, issued in accordance with the current Federal Acquisition Regulation (FAR) statute for a period of up to fifty (50) years, would prescribe the performance standards for the operation, repair, maintenance and replacement of the UDC systems. Additionally, in conjunction with the award of this contract, two real estate contracts would complete the privatization of the UDC systems. The ownership of the UDC systems' infrastructure would be transferred in full by deed or bill of sale to the successful offeror. To allow the successful offeror access to the infrastructure to accomplish work under the service contract, the Federal Government would grant easements to the land immediately surrounding the existing UDC systems.

MDW, as the major Army command ultimately responsible for overseeing all activities at Fort McNair and the sponsor of the recent utility privatization studies for the command, has proposed consolidating the privatization of thirteen (13) selected UDC systems at its five NCR installations as the best means for implementing DoD and DA privatization policy. The McNair UDC systems would be included in this grouping as part of the overall MDW privatization initiative. One or more of the UDC systems at Fort McNair, if pursued separately for privatization, might not be economically viable for takeover by prospective offerors given the specifics of the systems' present condition, routing, and customer base. The utility systems located at the other four NCR installations, presumed to possess greater potential profitability, would be combined with these systems, envisioned as having less potential profitability. Although the systems at Fort Myer might require more resources than can be gained, the overall benefits of the consolidated project would entice offerors to accept this partial loss. By implementing this innovative approach to privatization, MDW seeks to cultivate an apparent, growing competitive interest in the non-Federal sector for this potential business opportunity, setting an example for more than 1000 potentially applicable UDC systems DoD-wide.

Since prospective offerors would be able to bid on the consolidated UDC systems at one, several or all of the MDW NCR installations, separate EAs are being prepared for each of the five installations, regarding this proposed action, emphasizing the environmental consequences to that specific installation. This EA supports the privatization effort at Fort McNair only. At first glance, this approach could be perceived as segmentation. However, after careful consideration, separating the environmental assessments was deemed appropriate and prudent for several reasons. First, that already alluded to, the contract it self could be awarded to one, two, three, four or five offerors. In essence, the Request for Proposals could result in a segmented contract award. Secondly, each of the installations, although under the command of MDW and located in the National Capital Region, are geographically separated and distinct. Three major, national political boundaries are crossed. Moreover, the utility systems to be privatized are isolated and different at each installation. Negative, cumulative environmental impacts from one to another are not anticipated. The environmental consequences are expected to occur only at a local level. Therefore, this approach serves the spirit of the National Environmental Protection Act and provides the project the flexibility it could require.

1.3 Scope of Analysis

This EA was developed in accordance with the National Environmental Policy Act (NEPA), implementing regulations issued by the Council on Environmental Quality (CEQ) and Army Regulation (AR) 200-2, *Environmental Effects of Army Actions*. Its purpose is to inform decision-makers and the public of the likely environmental and socioeconomic consequences of the proposed action and alternatives.

The EA identifies, documents and evaluates the potential environmental and socioeconomic effects associated with the proposed action to implement DoD and Army privatization policy at Fort McNair. Section 2.0 describes the proposed action. Section 3.0 sets forth alternatives to the proposed action, including a no-action alternative, and explains why certain alternatives will not be evaluated in detail. Section 4.0 describes the existing environmental conditions at Fort McNair that fall within the scope of this EA. Section 5.0 describes the environmental and socioeconomic consequences envisioned by adoption of either the proposed action or the no-action alternative. Section 6.0 presents the conclusions and findings.

An interdisciplinary team of environmental scientists, biologists, ecologists, planners, economists, engineers, historians, and military technicians has reviewed the proposed action and the alternatives in light of existing conditions and has identified relevant beneficial and adverse effects associated with the action. The EA focuses on effects likely to occur within the area of proposed action (i.e., the installation boundaries). The document analyzes direct effects (those resulting from the proposed action and occurring at the same time and place) and indirect effects (those resulting from the proposed action and occurring later in time or those farther removed in distance, but still reasonably foreseeable). The potential for cumulative effects is also addressed, and mitigation measures are identified where appropriate.

1.4 Public Involvement

MDW invites public participation throughout the NEPA process. Consideration of the views and information of all interested persons promotes open communications and enables better decision-making. All agencies, organizations and members of the public having a potential interest in the proposed action are urged to participate.

Public participation opportunities with respect to the proposed action evaluated in this EA are guided by AR 200-2, *Environmental Effects of Army Actions*. Upon final review and concurrence with this environmental assessment's findings that the proposed action would not be expected to result in significant environmental effects, Fort McNair would issue a Finding of No Significant Impact (FNSI). The public and concerned organizations would be informed of the FNSI and the availability of the EA by the publishing of a Notice of Availability (NOA) in local newspapers. For a period of thirty (30) days, starting with the day that the NOA is advertised, concerned organizations and the public would be encouraged to submit comments on the proposed action, the EA, and the FNSI. Work on the proposed action will not commence until this timeframe is observed and any resulting issues resolved. At any point in the process, the public may obtain information on the status and progress of the proposed action and the EA by contacting the U.S. Army Corps of Engineers, Baltimore District, Planning Division point of contact Mr. David Hand, telephone (410) 962-8154.

1.5 Framework for Analysis

A decision on whether to proceed with the proposed action rests on numerous factors, such as the Army's changing mission requirements, the successful completion of the privatization contracting process, availability of funding, determination of economic viability, and environmental considerations. In addressing environmental considerations, MDW and Fort McNair are guided by several relevant statutes and implementing regulations and by Executive Orders that establish standards and provide guidance on environmental and natural resource management and planning. These include, but are not limited to, the Clean Air Act, Clean Water Act, Endangered Species Act, Farmland Protection Policy Act, National Historic Preservation Act, Resource Conservation and Recovery Act, Executive Order *11988 (Floodplain Management*), Executive Order 11990 (*Protection of Wetlands*), Executive Order *12088 (Federal Compliance with Pollution Control Standards*), Executive Order 12898 (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*), and Executive Order 13045 (*Protection of Children from Environmental Health Risks and Safety Risks*). Where useful to better understanding, key provisions of these statutes and Executive Orders are described in more detail in the text of the EA. Table 1-1, provided below, summarizes the installation's current compliance status with these environmental statutes and Executive Orders.

Table 1-1: Compliance with Federal Environmental Statutes and Executive Orders[a]	
Acts	**Compliance[b]**
Anadromous Fish Conservation Act	FULL
Clean Air Act, as amended (Public Law 88-206)	FULL
Clean Water Act, as amended (Public Law 95-217)	FULL
Coastal Barrier Resources Act	FULL
Coastal Zone Management Act	FULL
Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986	FULL
Endangered Species Act of 1973, as amended (Public Law 93-205)	FULL
Estuary Protection Act	FULL
Federal Water Project Recreation Act	FULL
Fish and Wildlife Coordination Act, as amended (16 United States Code [U.S.C.] 661, et seq.)	FULL
Land and Water Conservation Fund Act	FULL
Marine Mammal Protection Act	FULL
Magnuson Fishery Conservation and Management Act, as amended (Public Law 94-265)	FULL
National Environmental Policy Act of 1969 (Public Law 91-190)	Ongoing
National Historic Preservation Act of 1966, as amended (Public Law 89-665)	Ongoing
Noise Control Act of 1972, as amended	FULL
Resource Conservation and Recovery Act (Public Law 94-580)	FULL
Rivers and Harbors Act	FULL
Safe Drinking Water Act, as amended (Public Law 93-523)	FULL
Solid Waste Disposal Act of 1965, as amended	FULL
Toxic Substances Control Act of 1976 (Public Law 94-469)	FULL
Watershed Protection and Flood Prevention Act of 1954 (16 U.S.C. 1101, et seq.)	FULL
Wetlands Conservation Act (Public Law 101-233)	FULL
Wild and Scenic Rivers Act	FULL

[a] Applies to all alternatives.

[b] Ongoing--Some requirements of the regulation remain to be met before implementing some activities. Full compliance is expected.

TABLE 1-1, continued:
Compliance with Federal Environmental Statutes and Executive Orders[a]

Executive Orders	
Flood Plain Management (Executive Order 11988)	FULL
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Environmental Justice in Minority Populations and Low-Income Populations (Executive Order 12898)	FULL
Invasive Species (Executive Order 13112)	FULL

[a]Applies to all alternatives.

[b]Ongoing--Some requirements of the regulation remain to be met before implementing some activities. Full compliance is expected.

2.0 PROPOSED ACTION

MDW and Fort McNair propose to implement DoD and DA directives and policy to privatize its electric, natural gas, water and wastewater UDC systems at Fort McNair. The privatization of these systems would be carried out through two steps, a real estate transaction and a service contract. The real property assets associated with the UDC systems infrastructure would be transferred to a non-Federal entity through a bill of sale or deed and access to the land on which the real property is situated would be granted to the same non-Federal entity by a perpetual easement. Additionally, a 10 to up to 50-year utility service contract would be awarded in accordance with current the FAR and recent Congressional legislation. MDW and Fort McNair seek one qualified non-Federal entity, regulated or unregulated, to own, operate, and maintain these four UDC systems at Fort McNair. MDW and Fort McNair have arranged with the Baltimore District, U.S. Army Corps of Engineers, to be the contracting agent for implementing the proposed action.

Implementation of the proposed action would represent the Government's preferred alternative for privatization of its McNair UDC systems. Other alternatives are presented in Section 3.0.

This EA was prepared to describe the environmental and socioeconomic impacts of privatizing the existing UDC systems at Fort McNair. The relevant, current environmental conditions of the real property that would be transferred and the land associated with the known easement areas that would be conveyed are discussed herein. Upon contract award, it would become the responsibility of the non-Federal entity to initiate action to bring all UDC systems into compliance with the general and specific industry performance standards that would be identified in the contract. Importantly, the non-Federal entity would be permitted to propose replacement of all or parts of one or more existing UDC systems or the installation of new or extended utility services that could be run in alignments outside the easement limits issued at time of contract award. A very general discussion of the potential impacts of such proposals is included in this EA as part of the Cumulative Impacts in Section 5.10. It would be incumbent, however, on the non-Federal entity to perform or obtain, at their expense, any necessary studies, assessments and documentation and approvals required prior to performing work outside the areas covered in this EA. This would include executing activities to comply with NEPA, and other federal, state and local government laws, codes and regulations, including permits. Clauses, conditions and restrictions in the real estate documents and the utility service contract would be included to assure that the non-Federal entity is responsible.

3.0 ALTERNATIVES

The Government has identified three alternatives for its proposed action, as well as the no-action alternative. These alternatives are discussed below.

3.1 Out-Source Operation and Maintenance of McNair UDC Systems

Under this alternative, the Government would out-source only the functions of operation and maintenance of the McNair UDC systems. The Government would retain ownership of the UDC systems infrastructure.

Since no asset ownership would be transferred, no financial leverage or other investment incentive is included in this alternative. The out-source contractor could not and would not be required to provide the necessary, near-term and long- term, major capital improvements to the UDC systems infrastructure that is in poor condition or in need of total replacement. This alternative would maintain the process of annual budget requests from the installation to the MACOM, DA and Congress for needed physical improvements. This status quo situation has proven to be unsuccessful consistently in the past and detrimental to the viability of the utility systems. Congress, by enacting the legislation to authorize the Secretary of a Military Department to privatize all utility systems, has recognized this problem. Additionally, adoption of this alternative would not comply with the DoD and Army directives to divest Government ownership of UDC systems. It does not privatize the systems. For these reasons, this alternative is does not fully comply with the purpose and need criteria for the proposed action and, as a result, will not be addressed further.

3.2 Privatization Restricted to the Current Alignments of the McNair UDC Systems

Under this alternative, the Government would implement privatization of its McNair UDC systems described under the proposed action, but would restrict the non-Federal entity to effect repair, rehabilitation, replacement or other infrastructure improvements to the UDC systems as currently aligned and within the easements to be issued upon contract award.

The Government has determined that adoption of this alternative would unduly restrict potential offerors from proposing what they determined to be the most efficient and economic means to improve existing infrastructure. Offerors would be precluded from proposing relocated or new routes for UDC systems outside the limits of easements to be granted based on current UDC system alignments. MDW and Fort McNair believe that, given the opportunity, offerors would consider proposing new or relocated UDC systems alignments, especially for those systems considered in need of total or major replacement. One goal of the privatization process is to maximize infrastructure upgrades or other improvements as part of achieving efficient, safe reliable utility service to installation customers at the lowest cost. Most importantly, proposals to conduct work outside the existing utility routes would be considered under the proposed action, a newly proposed action that would required its own process to comply with NEPA and other environmental laws and regulations. Safeguards, in the form of contract clauses and easement conditions and restrictions, requiring the privatization entity to be responsible for this compliance work would be placed in the appropriate proposed action documentation. For these

reasons, this alternative is not reasonable at this time and not ripe for examination further in this EA.

3.3 Unrestricted Privatization of McNair UDC Systems

Implementation of the proposed action, as described in Section 2.0, would represent the Government's preferred alternative for privatizing its remaining three UDC systems under Government control at Fort McNair. Accordingly, the environmental and socioeconomic consequences of the preferred alternative are evaluated in detail in Section 4.0 of this document.

3.4 The No-Action Alternative

This document refers to the continuation of existing conditions of the affected environment, without implementation of the proposed action, as the no-action alternative. The Council on Environmental Quality requires inclusion of the no-action alternative. The no-action alternative serves as the baseline against which the proposed action and alternatives can be evaluated.

Under the no-action alternative, the Government would retain ownership of the UDC systems at Fort McNair and would continue to be responsible for operating and maintaining those systems with its FMMC Directorate of Public Works and Logistics (DPWL) workforce. Maintenance and operational practices would most likely remain the same. Fort McNair would continue to obtain funding for the management of the utility systems through the congressional authorization and appropriations process. Any major changes to or construction of utility improvements would require that appropriate NEPA analyses are completed prior to implementing such actions.

Selecting the no-action alternative would not satisfy the need to provide immediate capital improvements to those existing systems or portions of systems in poor condition. Furthermore, it would not comply with DoD directives and Army policy to privatize UDC systems. Therefore, the no-action alternative is not preferred.

4.0 AFFECTED ENVIRONMENT

4.1 Project Area Description

4.1.1 Land Use

Fort McNair encompasses 99.9 acres on a peninsula between the Anacostia River and the Washington Channel of the Potomac River. The neighborhood to the north of Fort McNair is a developed mixed-use area, including high and medium-density apartments, offices, and commercial activities. The South Capitol Street Buzzard Point neighborhood east of the installation is a mixture of residential, commercial, office, and industrial areas (Non-Commissioned Officer (NCO) Family Housing Renovation EA, 1998). Forty-six percent of the total installation acreage of Fort McNair is used for recreation; this includes the 7.8-acre parade ground. The remainder is used for administration, service and storage, medical facilities, housing, and training facilities (Fort McNair Renovation of Building 35 EA, 1997).

4.1.2 Geology

The north-northeast trending fall line separates the District of Columbia into the Piedmont Province and the Coastal Plain Province. Fort McNair is located within the Coastal Plain Province and is situated on alluvium and artificial fill. In the Fort McNair area, the depth to crystalline rock is between 250 and 300 feet (NCO Family Housing Renovation EA, 1998).

4.1.3 Soils

Beltsville-Chillum Association and Iuka-Linside-Codorus Association soils are found at Fort McNair. Beltsville-Chillum Association soils are well-drained to moderately drained soils, underlain by sandy or gravelly deposits. Iuka-Linside-Codorus Association soils are moderately well-drained soils that are underlain by stratified alluvial sediment or man-deposited dredged material (NCO Family Housing Renovation EA, 1998).

4.1.4 Topography and Drainage

The topography of Fort McNair is nearly level, with very little topographical variation. Approximately half of the installation, on the eastern side, drains directly to the Anacostia River, while the remainder of the installation drains directly to the Potomac River.

4.1.5 Climate

Climate statistics are based upon observational records from Washington Reagan National Airport, located to the southwest, across the Potomac River from Fort McNair. The average daily maximum and minimum temperature range for 1990 was between 66.5° F and 48.5° F. The average annual precipitation is 39.00 inches. The prevailing wind direction is from the south at 9.4 miles per hour (NCO Family Housing Renovation EA, 1998).

4.2 Air Quality

Fort McNair lies within the Washington, D.C., Air Quality Basin. Monitoring of air quality around Fort McNair falls under the jurisdiction of the District of Columbia's Environmental Control Division of the Housing and Environmental Regulation Administration. This region is a

non-attainment zone for ozone and carbon monoxide. To the east of Fort McNair, across the Anacostia River in Maryland, the Maryland Department of the Environment monitors air quality. This area is a non-attainment zone for ozone.

4.3 Water Quality

4.3.1 Surface Water

No permanent or intermittent streams are located on the installation. However, Fort McNair is located at the confluence of the Anacostia River and the Washington Channel of the Potomac River. Both rivers are significant aquatic resources in the Washington area for commerce and recreation (Fort McNair, Draft Master Plan EA, 1995).

Water quality trends in the Potomac River have shown an improvement over the last 10 years. Much of this is attributed to improved performance at the Blue Plains Sewage Treatment Plant, whose effluent is moved upstream by tidal action. Recent data indicate that ortho-phosphate and total phosphorus concentrations have decreased, effluent oxygen demands are reduced, submerged aquatic vegetation has increased, and a general decrease in bacterial levels has occurred. Water quality data from a station at Haines Point, located across the channel from Fort McNair, indicate that dissolved oxygen, pH, and conductivity are within healthy levels (Fort McNair, Draft Master Plan EA, May 1995).

In the Anacostia River, water quality conditions have shown little improvement in recent years, and current data indicate that the river continues to endure significant stress, primarily from nonpoint sources. Major sources of degradation include stormwater runoff, sediment transport, combined sewer overflows, surface mining, and industrial operations. Water quality problems have included low dissolved oxygen (frequently below 2 ppm), poor water clarity, and high bacterial concentrations. From 1988 to 1989, water quality conditions ranged from fair to good (Fort McNair, Draft Master Plan EA, 1995).

4.3.2 Groundwater

The Patuxent Aquifer underlies Fort McNair and generally stores groundwater at a depth of 10 feet. Excavations deeper than 10 feet require continuous dewatering due to infiltration of groundwater. Aquifer recharge occurs from precipitation in the outcrop area and, in some areas, from downward leakage through confining beds. Prior to the introduction of municipal water supplies in the 1930's, water was most likely obtained from this aquifer. Groundwater in the area is not presently used as a drinking water supply; however, it is used for industrial purposes within 4 miles of the installation (Fort McNair, Draft Master Plan EA, 1995).

4.4 Aquatic Resources and Wetlands

Early accounts of Fort McNair describe areas of "unreclaimed marshland." The first landfill in 1851 filled an area covered by shallow water marshes. Today, a stone, brick, and concrete seawall approximately 4,886 feet long separates Fort McNair from the Washington Channel and the Anacostia River. The seawall extends from the northwest corner of the Installation to the yacht basin in the southeast corner. The presence of the seawall, in addition to past fill placement, has eliminated wetlands associated with either waterway. National Wetland Inventory (NWI) maps indicate no wetlands on the installation itself (see Appendix B, Figure 3: Wetlands, Floodplains, and Aquatic Resources). Palustrine and Riverine wetlands, however, are

located downstream of Fort McNair along the Potomac River. The closest mapped NWI wetlands are approximately 2 miles downstream (Fort McNair, Draft Master Plan EA, 1995). No jurisdictional wetlands or other Waters of the United States occur on the installation itself. The entire installation is raised and intensively developed, and no potential wetland areas have ever been noted by the FMMC DPWL.

4.5 Vegetation

The terrestrial flora on Fort McNair consists primarily of landscaped trees and grasses. The common grasses located on the property include Kentucky bluegrass (*Poa pratensis*), red fescue (*Festuca rubra*), perennial ryegrass (*Lolium perenne*), zoysia grass (*Zoysia sp*.), and Bermuda grass (*Cynodon dactylon*) maintained as turf. The predominant trees planted along the streets and buildings include Norway maple (*Acer platanoides*), sugar maple (*Acer saccharum*), northern red oak (*Quercus borealis*), pin oak (*Quercus palustris*), little-leaf linden (*Tilia cordata*), Yoshino cherry *(Prunus yedoensis),* Japanese pagoda tree (*Sophoro japonica*), and American elm (*Ulmus americana*) (NCO Family Housing Renovation EA, 1998).

Some of the native non-woody plants present in the Fort McNair area include wild garlic *(Allium vineale),* wild onion (*Allium canadense*), common chickweed (*Stellaria media*), crabgrass (*Digitaria* sp.), buttercup (*Ranunculus* sp.), and ground ivy (*Glecoma headeracea*).

4.6 Wildlife Resources

The fauna at Fort McNair is characteristic of wildlife found in an urban setting, including squirrels, chipmunks, and songbirds such as robins, mockingbirds, and house sparrows. The presence of unwanted insects, rodents, and birds is controlled using a pest management program.

Fish resources are an important component of the recreational aspect of the Anacostia River and the Washington Channel. Alewife *(Alosa pseudoharengus*), white perch (*Morone americana*), and gizzard shad (*Dorosoma cepedianum*) are abundant in the two waterways during migration. Pumpkinseed (*Lepomis gibbosus*) and bluegill (*Lepomis macrochirus*) are abundant resident fish.

4.7 Threatened and Endangered Species

The United States Department of the Interior, Fish and Wildlife Service, was requested by letter dated July 7, 1999 to provide information on threatened and endangered species at Fort McNair, in accordance with Section 7 of the Endangered Species Act. Their letter response, dated July 14, 1999, stated that, “except for occasional transient individuals, no proposed or federally listed endangered or threatened species are known to exist within the project area” (For correspondence, see Appendix A) However, two federally listed species occur in the Washington, D.C., area: the threatened Hays Spring Amphipod (*Stygobromus hayi*) located on the National Zoo property in Rock Creek Park, and the watch-listed bald eagle (*Haliaeetus leucocephalis*), which has been known to nest in lands adjoining the Potomac River 15 miles downstream of Fort McNair. The eagles forage along the river but have never been sighted on the installation.

4.8 Prime and Unique Farmlands

The United States Department of Agriculture (USDA) National Resource Conservation Service has verified that no areas of prime and unique farmland are located in the vicinity of Fort McNair (NCO Family Housing Renovation EA, 1998).

4.9 Wild and Scenic Rivers

The National Park Service has verified that no waterways in the vicinity of Fort McNair are protected under the Wild and Scenic Rivers program (NCO Family Housing Renovation EA, 1998).

4.10 Cultural Resources

4.10.1 Previous Investigations

Cultural investigations at Fort McNair have been limited to an architectural survey. Between 1991 and 1994 a draft cultural resource management plan was prepared. A draft National Register of Historic Places nomination form was prepared as part of this project. The archeological component consisted of an analysis of historic maps and mapping zones of areas with archeological potential.

4.10.2 Archeological Resources

No Phase I archeological investigations have ever been conducted on Fort McNair. The draft *Fort McNair Cultural Resources Management Plan*, dated May 1994, states that any prehistoric sites are likely to be deeply buried as a result of natural sedimentation and human actions such as filling. There have been several periods of building at Fort McNair and historic sites are potentially present on the installation. Presently there are no known archeological sites on Fort McNair; a Phase I survey in high probability areas would most likely locate archeological sites on the installation.

4.10.3 Architectural Resources

Fort McNair is the oldest continuously used military installation in the United States. There have been several periods of construction during the 18th and 19th centuries at the installation. The majority of the buildings presently located at Fort McNair date to the early 20th century. The buildings and landscape were designed by the prominent architectural firm McKim, Meade, and White. Building 61, part of the National Defense University, is listed as a National Historic Landmark. A previous architectural survey has identified a historic district at Fort McNair that is eligible for listing in the National Register of Historic Places. Historic district building numbers are listed in Table 4-1. The entire installation is treated as a *de facto* historic district, as shown on Figure 4: Cultural Resources, in Appendix B.

Table 4-1: Fort McNair Historic District Contributing Resources

Building Numbers

1	12	24	37	50
2	13	25	39	52
3	14	26	40	54
4	15	27	41	56
5	16	28	42	58
6	17	29	43	60
7	18	31	45	61*
8	19	32	46	
9	20	34	47	
10	21	35	48	
11	23	36	49	

* Building 61 is individually listed as a National Historic Landmark.

(Additionally, the Parade Ground, Flag Pole (No. 77), Reviewing Stand (No. 82), Main Entrance Gates, P Street Boundary Wall, Fifth Street Boundary Wall, and Sea Wall are also considered contributing elements in the historic district.)

4.11 Hazardous, Toxic, and Radioactive Substances (HTRS)

4.11.1 Underground Storage Tanks (USTs) and Above-Ground Storage Tanks (ASTs)

Ft. McNair currently has six (6) active USTs. All of the tanks contain either fuel oil or gasoline. Four of the tanks are scheduled for removal and replacement, and the remaining two tanks were installed in 1992 to replace old tanks that have been removed. Locations of the existing USTs are shown on Figure 5, in Appendix B. (NCO Family Housing Renovation EA, 1998).

Wiley and Wilson (1991a) reported an additional location that may contain an inactive UST. A heating oil tank that once serviced the former greenhouse may be buried under the parking lot on the east side of the main gate. No visible signs indicate the existence of this tank (NCO Family Housing Renovation EA, 1998).

A gasoline spill occurred on February 14, 1990, at the Army-Air Force Exchange Service (AAFES) Service Station (Building #43). A testing contractor pumped too much air into a UST line, resulting in a rupture. Approximately 300 gallons of gasoline were discharged. The National Response Team (NRT) was notified; however, the spill was contained and no gasoline reached receiving waters (NCO Family Housing Renovation EA, 1998).

Remediation designs are being finalized to remediate soil and groundwater contamination that was detected during the 1991-1992 removal of USTs at the AAFES service station (NCO Family Housing Renovation EA, 1998).

ASTs are utilized, on a limited basis, at Fort McNair for storage of diesel fuel and gasoline. Three ASTs are currently being used on the installation. Two diesel fuel tanks, one of 300-gallon capacity and one of 275-gallon capacity, are stored at Building #62. A 2,000-gallon concrete vaulted, double-walled storage tank has been installed at the P Street parking lot in the northeast corner of the installation to provide diesel storage.

4.11.2 Polychlorinated Biphenyls (PCBs)

The U.S. Army Toxic and Hazardous Materials Property Report for Ft. McNair Building No. 11605 identified seven transformers at substations C, E, H-1, H-2, K, D, and L that contained PCBs at various concentrations. In compliance with Engineering Technical Letter 1110-3-412, the transformers were removed and replaced. No known regulated PCB transformers currently remain at Fort McNair (NCO Family Housing Renovation EA, 1998).

4.11.3 Radon

Radon monitoring of Fort McNair was conducted in 1989. The Radon Monitoring Report, Phase II, for MDW's Fort Myer, Fort McNair, and the former Cameron Station found radon concentrations ranging from 0.3 pCi/L to 2.5 pCi/L. These levels were well within EPA acceptable levels and required no action (NCO Family Housing Renovation EA, 1998). No reports were found to exist for any monitoring completed since 1989.

4.11.4 Asbestos Containing Materials (ACM)

No documented installation-wide survey of asbestos at Fort McNair exists. Asbestos is likely to be present within the installation, but its types and locations are unknown. Potential problem areas are mechanical rooms and other low-occupation rooms where asbestos-insulated piping may be exposed (NCO Family Housing Renovation EA, 1998).

Most ACM were banned from production by 1973, but were widely used as building materials prior to this date. Based on the age of the buildings, it is assumed that the installation does contain ACM, most likely in the form of pipe insulation. FMMC's asbestos specialist indicated that some of the residence quarters have asbestos on the insides of doors and baseboards (NCO Family Housing Renovation EA, 1998).

4.11.5 Lead-Based Paints (LBP)

Use of LBPs were banned in 1978. Since the NCO Family Housing units were built prior to 1978, it can be assumed that painted surfaces contain LBP. FMMC's specialist indicated that some of the quarters have LBP on the exterior trim of the windows and doors, and also on the insides of doors and baseboards (NCO Family Housing Renovation EA, 1998).

4.11.6 Pesticides, Herbicides, and Fertilizers

The application of pesticides, herbicides, and fertilizers at Ft. McNair is divided into two programs: Ft. McNair Golf Course maintenance, which is administered by the Directorate of Personnel and Community Activities, and general grounds maintenance, which is administered by the Directorate of Public Works, Operations and Maintenance Division. To minimize potential contamination of the Washington Channel and the Anacostia River, all applications are

in a dry powder or pellet form. Pesticides, herbicides, and fertilizers used on the general grounds of Ft. McNair are stored in Building 37. The pesticides, herbicides and fertilizers used in golf course maintenance are stored in an Environmental Protection Agency (EPA)-approved chemical storage unit in the P Street lot (NCO Family Housing Renovation EA, 1998).

4.11.7 Hazardous Materials Storage

Hazardous material and hazardous waste inventory data for Fort McNair were collected by field investigations performed in late 1990 by Wiley & Wilson (1991b). Under the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, 29 Code of Federal Regulations (CFR) 1900.1200, Material Safety Data Sheets define hazardous chemicals in the workplace. The locations of hazardous substances at Fort McNair, as provided by installation staff in December of 1999, are listed in Table 4-2, and shown on Figure 5, Appendix B.

Table 4-2: Hazardous Substance Storage Locations at Fort McNair.

TENANT	BUILDING #
AAFES Service Station	43
Arts and Crafts Shop	45
FE Boiler Plant	34 North
FE Carpentry Shop	34
FE Electric Shop	36 North
FE HVAC/Plumbing Shop	39 South and #45
FE Paint Shop	36 South
FE Roads and Grounds Shop	40 West
NCO/Officers Club	45
Quartermasters Service Station	37
General	P Street Parking Lot

4.11.8 Contaminated Areas

Soil contamination was identified between Buildings 35 (Old Commissary) and Building 43 (AAFES Gas Station), during the removal of USTs that once served the AAFES Gas Station. The USTs have since been removed along with the contaminated soils. In November 1998, the Building 43 site was being remediated using a pump-and-treat system. The carbon absorption system has been operating very efficiently, resulting in non-detectable levels. The locations of contaminated areas at Fort McNair are shown on Figure 5, Appendix B (NCO Family Housing Renovation EA, 1998).

4.12 Infrastructure

4.12.1 Electrical Distribution System Description and Requirements

4.12.1.1 Current Service Arrangements.

Fort McNair currently purchases electricity from Potomac Electric Power Company (PEPCO) under a retail customer rate. The Fort McNair Main substation consists of a sheltered-aisle metalclad switchgear assembly that is supplied from two PEPCO 13.8 kV underground feeders (Feeder #14639 and Feeder #14642) at 4th and P Streets. A second service supplies separate PEPCO feeders (Feeder #14637 and Feeder #14639) and switchgear near 2nd and T Streets that serves only Marshall Hall (Bldg. #62). The proposed action would not include the procurement of electricity and would not, therefore, affect the current electricity contract with PEPCO.

4.12.1.2 Electrical Distribution System.

The switchgear assembly consists of three primary circuit breakers (two feeder breakers and one tie breaker) and related metering and relaying equipment. The main substation provides control and over-current protection for the two 13.8 kV underground feeders. The main installation feeders terminate in a Government-owned, medium voltage set of switchgear located in a metal enclosure adjacent to P Street. This switchgear consists of two 13.8 kV, 1200 amp, 500 MVA, main air circuit breakers with a 1200A bus, protective relaying, and a 1200 amp tie breaker. There are two outgoing feeders designated No.1 (East) and No. 2 (West) Installation feeders. These feeders are installed entirely underground in duct banks and manholes. This system was installed in 1966 with some cable rerouting and transfer of loads over the ensuing years. Both the East and West Installation feeders are 15 kV, 1/0, shielded copper with an ampacity of 195 amps (4.4 MVA). The majority of the 15 kV primary cables are lead sheathed due to the abundance of water in manholes.

4.12.1.3 Electric System Requirements.

Implementation of the proposed action would make the non-Federal entity responsible to manage the operation, maintenance, repairs, replacement, extension and/or removal of all or portions of the electrical distribution system to ensure adequate and dependable electric service is distributed to each Government or tenant connection within the installation premises. The non-Federal entity would assume ownership at the point attachment of the two PEPCO underground feeders at the Fort McNair main substation.

4.12.1.4 Transmission Voltage / Demarcation Requirements.

Transmission voltage would continue to be distributed throughout the Installation for transformation to a primary voltage of 13.2 kV. The non-Federal entity would be responsible for ensuring proper distribution of primary voltage for final transformation to each building or facility currently being served. Typical operating voltages include: 120V, 208V, 240V, and 277/480V (Building #62 only) single- and three-phase at 60 Hz. The Government would retain the responsibility at the service entrance (weatherhead, typically) for all aerial services up to and including the main breaker (disconnect or panel), within a building on the secondary side.

4.12.2 Natural Gas Utility Distribution System Description and Requirements

4.12.2.1 Current Service Arrangements.

Fort McNair purchases natural gas through a DoD supply contract. Natural gas is transported and delivered to the Ft. McNair distribution system by Washington Light and Gas Company (Washington Gas). The natural gas is delivered to the main connection point with Washington Gas at Building #44 along P Street near the Washington Channel. Building #44 contains two master meters and a pressure-reducing valve owned by Washington Gas. Washington Gas directly supplies buildings #59, #61, #62, and the boiler building, #34. Washington Gas owns the supply line, meter and regulator (which would not be included in the proposed action), and the natural gas is supplied through a DoD natural gas contract. The proposed action would not include the procurement of natural gas and would not, therefore, affect the current Fort McNair/DoD/Washington Gas natural gas agreement.

4.12.2.2 Natural Gas Distribution System.

The Fort McNair natural gas distribution system consists primarily of approximately 10,660 feet (2.0 miles) of pipe. The cathodically protected steel pipe ranges in size from less than 2 inches to 10 inches in diameter. The natural gas distribution system operates approximately at 7.5 psi and serves approximately 53 building services.

4.12.2.3 Natural Gas System Requirements.

Implementation of the proposed action would make the non-Federal entity responsible to manage the maintenance, repairs, expansion, and replacement of the natural gas distribution system to ensure that adequate and dependable natural gas service is distributed to each Government or tenant connection within the service premises. The non-Federal entity would also be responsible for funding all capital investments required to acquire (if applicable), maintain, and operate the Fort McNair natural gas distribution system in a safe, reliable manner and to meet any contractual requirements set forth, including environmental compliance. The non-Federal entity would also be responsible for the abandonment and environmental compliance necessary to de-commission the existing natural gas distribution system, if such action were determined to be necessary.

4.12.2.4 Demarcation Requirements.

If the proposed action were to be implemented, the Government would maintain responsibility from the downstream side of the building service entrance or meter for the natural gas system. The non-Federal entity would assume responsibility from the upstream side of the building service entrance to the low side of the Washington/Fort McNair natural gas delivery point.

4.12.3 Potable Water Utility Distribution System Description and Requirements

4.12.3.1 Current Service Arrangements.

The Fort McNair potable water distribution system consists exclusively of a water line distribution system containing water main lines, fire hydrants, and check valves. No water treatment facilities exist. Fort McNair is supplied with potable water by the District of Columbia Department of Environmental Services (DCDES). The potable water distribution system is owned and maintained by Fort McNair. There are three points of connection to the District of

Columbia system on the perimeter of the Installation; one at the main gate at P Street, one at V Street and 2nd Street, and one at 2nd Street between T and U Streets. The third location is a metered connection serving Marshall Hall (Bldg. #62) only. All three connection points contain meters. Implementation of the proposed action would not include the procurement of potable water and would not, therefore, affect the current potable water agreement with the DCDES.

4.12.3.2 Potable Water Distribution System.

The potable water distribution system was completely upgraded in 1988. The distribution system is laid out in a classical grid pattern wherein there are no dead-end conditions except for fire hydrant leads off main lines. There are approximately 13,375 feet of water lines, and 30 fire hydrants in the distribution system. Of the approximately 13,375 feet of line, approximately 11,935 feet are lines 8 inches in diameter. Almost all piping that is 8 inches in diameter or less is poly-vinyl chloride (PVC), and almost all 12-inch diameter piping is ductile iron.

4.12.3.3 Potable Water System Requirements.

Implementation of the proposed action would require the non-Federal entity to operate, maintain, and expand, if necessary, the Fort McNair potable water distribution system in accordance with the District of Columbia and other Federal and local applicable health, safety, environmental and operational laws, regulations or standards. The non-Federal entity would be responsible to modify its service practices as required when applicable Federal, state or local laws, regulations or standards would be changed or new ones be placed into effect. The total potable water demand would also include fire protection. The required fire demand at Fort McNair is estimated for a single fire, 4 hours in duration, requiring 1,500 gallons per minute, plus, an additional 50 percent of emergency peak domestic flow.

4.12.3.4 Service Laterals.

Implementation of the proposed action would include service laterals as part of the potable water distribution system to be transferred. Service laterals are defined as the smaller-diameter (normally 2-inch or less) lines that connect each building to the upstream distribution mains. The distribution mains are the larger-diameter (normally greater than 2-inch) lines. Service laterals extend to the cutoff valves of the building served by the lateral.

4.12.4 Wastewater Utility Collection System Description and Requirements

4.12.4.1 Current Service Arrangements.

The Fort McNair wastewater collection system consists of a sewer collection system. There are no lift stations or treatment facilities on Fort McNair. Treatment of sewage is performed off-site by the DCDES. The wastewater collection system is operated and maintained by Installation personnel. The proposed action would not include the procurement of wastewater treatment and would not, therefore, affect the current wastewater treatment agreement with the DCDES.

4.12.4.2 Wastewater Collection System.

The Fort McNair wastewater collection system dates back to the 1920's. Since then, wastewater lines have been installed as new buildings were constructed and wastewater replacement funds were made available. There is some wastewater construction currently underway. Most of the piping material in the collection system is terra cotta, but recent upgrades have been made using

PVC. The wastewater collection system consists of approximately 9,605 feet of pipe and 65 manholes. The wastewater generated on the Installation flows by gravity from each building and is delivered to the District of Columbia's collection lines at five locations. Two connection points are along P Street, two others are along 2nd Street, and one is along 5th Street. There are no pumping or lift stations on the Installation.

4.12.4.3 Wastewater Collection System Requirements.

Implementation of the proposed action would require that the non-Federal entity operate, maintain, and expand, if necessary, the Fort McNair wastewater collection system in accordance with District of Columbia and other applicable Federal and local, health, safety, environmental, and operational laws, regulations, or standards. The non-Federal entity would be responsible to modify its service practices as required when applicable Federal, state or local laws, regulations, or standards would be changed or new ones placed into effect.

4.12.4.4 Service Laterals.

Implementation of the proposed action would include service laterals as part of the wastewater collection system to be transferred. Service laterals are defined as the smaller-diameter (normally 6-inch or less) lines that connect each service building to the wastewater force mains. The collection mains are larger-diameter (normally greater than 12-inch) lines. Service laterals extend to the exterior walls of the building served by the lateral.

4.12.5 Telecommunications

Telephone services to Fort McNair are provided by Bell Atlantic Telephone. Bell Atlantic owns and maintains its own telephone lines; however, the Federal Government owns the telephone equipment on the installation. The current system is adequate for existing usage of the installation (NCO Family Housing Renovation EA, 1998).

4.12.6 Solid Waste

Fort McNair's solid wastes are collected two times a week by a contractor and deposited at an approved off-site landfill. Fort McNair also participates in the MDW Resource Recovery and Recycling Program, including non-hazardous and non-precious materials (NCO Family Housing Renovation EA, 1998).

4.12.7 Traffic and Transportation

4.12.7.1 Ground Transportation

Primary access to Fort McNair is from the main entrance located on 4th and P Streets, SW. A second entrance, primarily used for truck traffic and access to the parking lot on the installation's east side, is on P Street near Canal Street. Within Fort McNair, the flow of traffic is primarily from the Third Avenue entrance road, diverted at B Street into Second and Fifth Avenues. Occasional minor traffic congestion occurs on the installation during peak periods, especially at the northern end of the installation where buildings are situated close to one another. Three metrobus routes provide access to Ft. McNair (NCO Family Housing Renovation EA, 1998).

4.12.7.2 Air Transportation

Two restricted-use helicopter landing sites provide direct air access to Fort McNair. One landing site is located on Greenleaf Point, southwest of the National War College, and the other site is in the center of the golf course north of the National War College. Use of these landing sites requires prior landing clearance from the Operations Office (NCO Family Housing Renovation EA, 1998).

4.13 Socioeconomic Conditions

4.13.1 Demographics

Fort McNair is 89 acres in size and lies entirely within Census Tract 63.02. The scenic installation is bordered by the Anacostia River and Washington Ship Channel. Approximately forty-six percent of the total installation acreage of Fort McNair is used for recreational purposes, which includes a 7.8-acre parade ground. The remainder of the installation is used primarily for is training, administration, service, medical, and housing facilities. The installation itself provides housing to many high ranking military leaders stationed in the area. The overall aggregate on-post housing though is limited. Most of the military service members who are receiving training at Fort McNair, or who are stationed there, live off post. These military personnel live either in the surrounding Washington, D.C., metropolitan area (including Washington, D.C., and suburban Maryland and Virginia).

The neighborhood to the north of Fort McNair is considered a mixed-use developed area, including high and medium-density apartments, offices and commercial areas located along the Washington Channel in the Southwest areas of the District of Columbia. East of the installation, is a mixture of residential, commercial, office, and industrial areas. The installation is in close proximity to the South Capitol Street - Buzzards Point area. Nearby census tract 72, which is adjacent to Fort McNair, had a population of 2,089 in 1990, of which 82 percent of the population was minority. The neighborhoods surrounding Fort McNair had one of the lowest household income levels within the District of Columbia and are considered economically depressed (Fort McNair Master Plan EA, May 1995).

4.13.2 Economics

Fort McNair has been in continuos operation since 1791, and is the third longest continually operating military installation in the United States. The installation is part of the U.S. Army's newest garrison command (FMMC) along with Fort Myer. These two installations represent the most historic Army installations. The current employment strength for Fort McNair consists of 1,167 military, and 1,601 permanent civilian personnel. The majority of the military service members stationed on Fort McNair are part of the Third Infantry known as the Commander and Chief's Guard, as well as other units. The installation supports both active and reserve personnel, family members of all services and large retiree population. Most of the off-post personnel do not reside in the immediate area of the installation. Many of the civilians that work on the installation work for the Military District of Washington Headquarters, for other on post tenant organizations, or at one of the several prestigious training schools and colleges located on post.

Fort McNair is home for the Military District of Washington's Headquarters since 1966. The installation is also home to the Third Infantry, as well as other units. There are a number of military training schools located on the installation including the National Defense University at Marshall Hall, the National War College, and The Information Resources Management College. In addition, the Inter-American Defense College is also located on the installation, which supports the training of 25 member nation countries. Though the installation is not considered large, it does represent a significant economic force in the area by the nature of good and services purchased to sustain base operations.

4.13.3 Schools, Libraries, and Recreation Facilities

There are no primary or secondary schools located at Fort McNair. The National Defense University Library is located on the installation. Schools and additional libraries are located within close proximity to Fort McNair.

Recreation facilities located at Fort McNair include a nine-hole golf course, tennis courts, softball fields, volleyball courts, basketball courts, a swimming pool, and a gymnasium (NCO Family Housing Renovation EA, 1998).

4.13.4 Public Health and Safety

Police support is available from two stations both located less than a mile from the installation: one on South Capitol Street and the other, the First District Police Headquarters, just north of the Interstate 395 on E Street. Additional support comes from the harbor police located on the Washington Channel. Also, military police are located on the installation. Two fire stations are located less than a mile from the installation (NCO Family Housing Renovation EA, 1998).

The Fort McNair Clinic is located in Building 58. The clinic has an ambulance van that can provide initial emergency response care. Two other health care facilities are available for military personnel at Fort Myer. In addition, four other medical facilities are accessible from Fort McNair: Walter Reed Army Medical Center in the District of Columbia; Bethesda National Naval Medical Center in Bethesda, Maryland; Malcolm Grow U.S. Air Force Medical Center at Andrews Air Force Base, Maryland; and Dewitt Army Hospital at Fort Belvoir Army Base, Virginia (NCO Family Housing Renovation EA, 1998).

4.13.5 Noise

A 1990 noise study conducted by the Metropolitan Washington Airports Authority concluded that most of Fort McNair falls within a normally incompatible noise zone as defined by the Installation Compatible Use Zone (ICUZ) program. Results of an additional study in 1992 conducted by the U.S. Army Center for Health Promotion and Prevention Medicine (USACHPPM) agreed with those of the earlier study. The major contributors to the noise pollution are considered to be air and motor vehicle traffic. However, the noise sources are generated by off-site facilities. The major off-site noise source is air traffic originating from the Ronald Reagan National Airport, the Anacostia Naval Station and the Bolling Air Force Base (NCO Family Housing Renovation EA, 1998).

Noise pollution generated on the installation is short-term and produces little interference with activities on the installation. Helicopter landings are infrequent at Fort McNair. Cannon blasts

and recorded bugle calls during the flag raising and lowering are the primary source of daily noise (NCO Family Housing Renovation EA, 1998).

4.13.6 Visual and Aesthetic Values

Although several structures at Fort McNair are aesthetically impressive on their own merits, the installation as a whole provides a collective significance and aesthetic value greater than the importance of the individual components. The installation also affords views across the Anacostia and Potomac Rivers from almost every spot on the site. Because of the aesthetic value of Fort McNair, the essential character is to be maintained or restored and architectural compatibility is to be achieved in future. Fort McNair does not contain any viewshed restrictions or easements.

4.14 Environmental Justice

Census Tract 72, which is adjacent to Fort McNair, had a population of 2,089 in 1990, of which 82 percent were minorities. The minority population in the District of Columbia as a whole is approximately 70 percent. The area surrounding Fort McNair has one of the lowest household income levels in the District, and is considered economically depressed (NCO Family Housing Renovation EA, 1998).

5.0 ENVIRONMENTAL AND SOCIO-ECONOMIC CONSEQUENCES

The subsections below describe the environmental and socio-economic consequences upon the natural and manmade environment associated with implementation of the proposed action. The evaluation of effects is based upon the assumption that the non-Federal entity would be responsible for ensuring that all actions or practices involving future expansion, maintenance, and upgrades of the UDC systems would comply with applicable Federal and District of Columbia environmental laws and regulations. The no-action alternative would have no impacts to the resources presented in the subsections below.

The proposed action is envisioned as a two part initiative: part one is the actual contractual transfer of responsibilities from the Federal Government to the non-Federal entity and part two is the ongoing responsibility of the non-Federal entity to operate and maintain the Belvoir UDC systems, and expand these systems as future operational needs may require. Operation and maintenance will not modify the existing capacity of the systems. Therefore, these activities essentially result in no change to the current natural and man-made environment. Expansion, however, implies an inherent change in supplied service that is a result of an increase in demand most likely to be expected from future building construction. Expansion of the services currently provided to the installation will result in some impact to the natural and manmade environment. The magnitude of these effects can be estimated by data such as the installation's 5-year Master Plan, which will be made available to all prospective offerors.

Expansion of the existing UDC systems, if and when it occurs, would be considered a Federal action, and would first require all environmental, cultural and other coordination with the Installation and MDW to be performed before initiation of any physical work. The following paragraphs address impacts associated with expected UDC system expansion in a general sense, and do not attempt to identify specific instances.

The following list of resources were evaluated and it was determined that the proposed action would have no impact or appreciable detrimental effect on them:

- Land Use
- Climate
- Aquatic Resources and Wetlands
- Threatened and Endangered Species
- Prime and Unique Farmlands
- Wild and Scenic Rivers
- Telecommunications
- Solid Waste
- Potable Water
- Demographics
- Schools, Libraries and Recreational Facilities
- Environmental Justice

Therefore, impacts to these resources will not be addressed further by this EA.

5.1 Project Area

5.1.1 Geology

No significant adverse effects upon the installation geologic features would be expected as a result of the proposed action. Any utility upgrades, expansion, or replacement work to be performed would not involve significant, deep earthwork disturbance, and therefore would not be expected to significantly affect the rock and soil formation processes of the area.

5.1.2 Soils

No significant adverse effects upon soils would be expected as a result of the proposed action. Future utility upgrades, expansion, or replacements may temporarily effect soils within the existing easement areas. However, these soils were likely disturbed during the construction of the existing utilities, and would be subject to further disturbance in the normal course of repairing or maintaining these existing systems. Concerns regarding the protection of the integrity of surface and topsoil would be addressed during subsequent evaluation of the non-Federal entity's engineering designs. Notes that recommend the non-Federal entity installing underground utilities to sort, stockpile, and replace the top 12 inches of soil would normally be shown on the design plans or included in the special provisions of construction specifications.

5.1.3 Topography and Drainage

The proposed action would not be expected to have an effect on the topography and drainage at Fort McNair. Any utility upgrade or replacement may temporarily effect a small area within the existing easements, but these disturbances would be restored to their existing grades when construction is complete. Expansion of the utilities systems outside the existing easements is anticipated, and would require further environmental evaluation.

5.2 Air Quality

Implementation of the proposed action would transfer the responsibility for utilities operations from the Government to a non-Federal entity and would be expected to have no measurable impact on air quality in the Fort McNair area. Currently, Fort McNair already receives electric, natural gas, water, and wastewater services from outside vendors, so the transfer of these services would be a paper transaction only. Furthermore, any proposed upgrade, expansion, or replacement would be performed to improve efficiency, provide for safety, or as a repair. No foreseeable changes would be done to any of these systems in response to an increase in demand. Therefore, there would be no significant increase or decrease in air emissions in the project area as a result of the utility privatization.

5.3 Water Quality

Implementation of the proposed action is unlikely to have any physical or chemical effects upon water quality resources at Fort McNair, as no work within the water itself is likely to occur as a result of the proposed action. Additionally, any utility system upgrades, expansion, repairs, and replacements would be conducted in compliance with Federal and District of Columbia laws and regulations designed to protect water quality and other resources. The proposed action would not, of itself, increase demand nor result in a change in water quality at the installation.

5.4 Vegetation

Implementation of the proposed action would be expected to have no measurable impact upon the quality or composition of the vegetation at Fort McNair. Currently, the installation receives electric, natural gas, water, and wastewater services from outside vendors, so the transfer of these services would be a paper transaction only, resulting in no physical impact. Furthermore, any proposed upgrade, repair, or replacement would be performed to improve efficiency, provide for safety, or as a repair. Any upgrade or expansion of service may cause minor, local damage to or removal of vegetation as a result of the groundbreaking necessary for line access. However, the vegetation on Fort McNair is primarily grass and ornamental plantings, which can easily be replanted when the access trenches are backfilled. No foreseeable changes would be evident in any of these systems as a response to a regular increase in demand, as the utilities run underground, and would not require any vegetation removal except for maintenance or construction. For these reasons, there would be no significant impact on vegetative habitat within the installation project area as a result of the utility privatization.

5.5 Wildlife Resources

Implementation of the proposed action would be expected to have no measurable impact on wildlife resources in the Fort McNair area. Currently, Fort McNair receives electric, natural gas, water, and wastewater services from outside vendors, so the transfer of these services would be a paper transaction only, resulting in no physical impact. Furthermore, any proposed upgrade or replacement would be performed to improve efficiency, provide for safety, or as a repair. No foreseeable changes would be evident in any of these systems as a response to a regular increase in demand, as the utilities run underground, and would not require any vegetation removal except for maintenance or construction. For these reasons, there would be no significant impact on wildlife or wildlife habitat within the installation project area as a result of the utility privatization.

5.6 Cultural Resources

No significant adverse effects upon cultural resources would be expected to occur as a result of the proposed action. The proposed action would involve the transfer of ownership and the responsibility to operate and maintain the electric, water and wastewater UDC systems on Fort McNair. The privatization of the UDC systems would have no physical effects on any aspect of the installation. The only foreseeable effects of the proposed action upon these resources are secondary, specifically the effects of anticipated construction activities conducted by the non-Federal entity responsible for the upgrading, repairing or replacing the existing utility systems.

5.6.1 Archeological Resources

Land currently occupied by the existing utility systems has been previously disturbed by the installation of the utilities and has little potential for archeological resources. Any action taken outside existing easements may impact archeological resources. Expansion of the utilities outside the existing easements could disturb any undiscovered archeological sites that may be located on the installation. Presently there are no known archeological sites on Fort McNair.

National Historic Preservation Act (NHPA) Section 106 consultation with the District of Columbia SHPO has been initiated. A project initiation meeting was held in June 1999 with the State Historic Preservation Office (SHPO) and other regulatory authorities. A letter formally initiating consultation with the SHPO was sent on July 1, 1999. A follow-up letter transmitting this EA and findings to the DC SHPO is being prepared. The results of the consultation will be incorporated into the final version of this document..

5.6.2 Architectural Resources

As described in Section 5.7.1, NHPA Section 106 consultation with the DC SHPO has been initiated. The results of the consultation will be incorporated into the final version of this document.

5.7 Hazardous, Toxic, and Radioactive Substances (HTRS)

Because the proposed action is expected not to change current operations and maintenance procedures at Fort McNair, no new sources of hazardous or toxic materials would be expected to occur from normal operations. Any unusual or accidental action that might result in the release of such materials would not be linked solely to the contractual implementation of the proposed privatization action. Therefore, no impacts would be anticipated from hazardous and toxic materials as a result of the proposed action.

5.8 Infrastructure

5.8.1 Utilities

Prior to contract award, the existing supply and service agreements between the Government and the various utility companies will need to be reviewed by the appropriate Government legal offices to ensure that they contain no clauses that would preclude or unduly hinder transfer of ownership, operation and maintenance of UDC systems under this privatization initiative. Certain existing contracts may need modification, or new contracts may need to be drafted to convey rights and easements to the Federal properties at Fort McNair. Although the full ramifications of these actions are not fully known, initial contact with representatives at Fort McNair has indicated that no unresolvable issues are anticipated and that preparation of an easement(s) agreement should not be encumbered by pre-existing conditions.

Under certain circumstances, utility companies may have already obtained easements to construct and maintain infrastructure within the installation boundaries, but these utilities serve specially designated installation tenants or customers at locations outside the installation boundaries. Portions of the UDC systems within these existing easements are not part of this MDW privatization initiative.

5.8.1.1 Electric

PEPCO currently supplies electric power to Fort McNair. Implementing the proposed action would result in the successful non-Federal entity taking over the responsibility for the distribution system within the Fort McNair installation. This is a transfer of ownership of the distribution system only, and would not affect the procurement or delivery of the electric power commodity. Therefore, no interruption in service would be anticipated because of this action. Subsequent improvements to the electric distribution system may require brief power

interruption as new cables are brought on-line. These disruptions would most likely be pre-arranged, should they be necessary, thus reducing their impact. Once upgrades are performed, the likelihood of power interruption should be reduced from present levels, due to the improved quality of the distribution system. Therefore, no significant impact would be expected to the electric distribution system.

5.8.1.2 Natural Gas

Washington Gas Light Company currently supplies natural gas for Fort McNair. Implementing the proposed action would result in the successful non-Federal entity taking over the responsibility for the operation and maintenance of the distribution system within the Fort McNair installation. This is a transfer of ownership of the distribution system only, and would not affect the procurement or delivery of the natural gas itself. Therefore, no interruption in service would be anticipated from this action. Subsequent improvements to the distribution system may require brief gas shutoffs and interruption of flow as new pipes are brought on-line. These disruptions would most likely be pre-arranged, should they be necessary, thus reducing their impact. Once upgrades are performed, the likelihood of service interruption should be reduced from present levels, due to the improved quality of the distribution system. Therefore, no significant impact would be expected to the natural gas distribution system.

5.8.1.3 Water

The DCDES currently supplies potable water for Fort McNair. As a result of the proposed action, the successful non-Federal entity would take on the responsibility for the operation and maintenance of the water distribution system within the Fort McNair installation. This is a transfer of ownership of the distribution system only, and would not affect the procurement or delivery of the water commodity. Therefore, no interruption in service would be anticipated because of this action. Subsequent improvements to the distribution system may require brief water shutoffs and interruption of flow as new pipes are brought on-line. These disruptions would most likely be pre-arranged, should they be necessary, thus reducing their impact. Therefore, no significant impact would be expected to the water distribution system.

5.8.1.4 Wastewater

The DCDES currently provides for collection and treatment of wastewater for Fort McNair. As a result of the proposed action, the successful non-Federal entity would take on the responsibility for the operation and maintenance of the wastewater collection system within the Fort McNair installation. This is a transfer of ownership of the distribution system only, and would not affect the current wastewater treatment contract with DCDES. Therefore, no interruption in service would be anticipated because of this action. Subsequent improvements to the wastewater collection system may require brief interruptions of effluent flow as new pipes are brought on-line. These disruptions would most likely be pre-arranged, should they be necessary, thus reducing their impact. Therefore, no significant impact would be expected to the wastewater distribution system.

5.8.2 Traffic and Transportation

Minor temporary increases in traffic volume would be expected as a result of implementing the proposed action. Traffic volume, however, would be anticipated to involve few vehicles (those of construction crewmembers, those of the utility non-Federal entity's engineers) and last only a

brief time. No permanent increase in traffic would be anticipated as a result of the proposed action. Therefore, no significant traffic impact would be anticipated as a result of the proposed project.

5.9 Socioeconomic Conditions

5.9.1 Economics

The foreseeable impact of implementation of the proposed privatization initiative would be expected to be minor. A financial analysis of the best-value prospective offer would be completed by the Government before the contract solicitation process to determine if the proposed action shows a positive life-cycle cost. The successful non-Federal entity, as the outright owner of the McNair UDC systems, would be responsible for maintenance and operation of the utility systems. The successful non-federal entity would also be responsible for implementing all necessary infrastructure repairs, upgrades and replacement work.

It is possible that some full-time equivalent (FTE's) positions in the current FMMC DPWL workforce may be affected by the loss of the operation and maintenance responsibilities under the proposed action. Some of these employees could be subject to reassignment within the FMMC, or face the possibility of employment termination. Any FMMC employee expected to be adversely affected from such a privatization initiative though would receive favorable consideration for employment from the non-Federal entity assuming control over the utility systems.

Minor economic effects from the proposed action include short-term increases in construction expenditures associated with improvements to the McNair UDC systems infrastructure. The non-Federal entity can program and move forward to implement infrastructure improvements in a more expedient manner than the Government would be able to program and fund any such needed improvements. A sufficient construction labor force exists within the area of the installation and surrounding jurisdictions to meet the labor requirements of any proposed action. Secondary economic effects from the implementation of any proposed action includes minor secondary expenditures from the non-Federal entities employees, and any subcontractors they may employ in maintaining or improving the existing utilities at the installation. This would entail possible increases in expenditures for restaurants, stores, etc. Direct and indirect economic effects of the potential loss of FTE personnel, and short-term increase in construction employment are not expected to represent a significant change to the installation or neighboring area.

From this discussion, therefore, no significant adverse economic effect would be expected to occur as a result of the proposed action. The implementation of this utility privatization initiative would not alter the quantity of current services being provided on the installation, but would mainly result in a transfer of responsibility for the operations and maintenance of the UDC systems to a non-Federal entity.

5.9.2 Public Health and Safety

Implementation of the proposed action would not be expected to have significant effect upon public health and safety. Currently, Fort McNair receives electric, natural gas, water, and wastewater service from outside vendors. The transfer of these services would be a paper transaction only. Any utility upgrade or replacement may temporarily effect a small area within the existing easements, but these disturbances would be restored to their existing grades when construction is complete. It is expected that all future construction and operation and maintenance would be performed following OSHA guidelines, which mandate acceptable health and safety standards.

5.9.3 Noise

Implementation of the proposed action would not be expected to have a significant effect upon existing noise levels. Currently, Fort McNair receives electric, natural gas, water, and wastewater service from outside vendors. The transfer of these services would be a paper transaction only. Any utility upgrade or replacement might temporarily effect a small area within the existing easements and would be performed to improve efficiency, provide for safety, or as a repair. It is expected that noise levels associated with this construction would be temporary and minor.

5.9.4 Visual and Aesthetic Values

The proposed privatization is a transfer of ownership only. Any physical construction occurring within the easements to be granted for the proposed action is covered by this EA. Any potential work outside the easements to be granted would have to be approved, and would be subject to additional environmental, regulatory, or installation ordinances. It is expected that only minimal, temporary effects on Fort McNair's visual or aesthetic values would result from the proposed action. Once any construction is complete, the visual and aesthetic values would be restored to their previous condition, as coordinated with the Government.

5.10 Cumulative Impacts

5.10.1 Impacts on the Natural Environment

The proposed action would result in the transfer of ownership of the electric, natural gas, water and wastewater distribution and collection systems to the successful non-Federal entity. It would also transfer responsibility to this entity to repair, upgrade or replace the existing utilities infrastructure within an expected period of 3 to 5 years so as to be able to operate and maintain these systems to necessary, prescribed industry standards. Foreseeable effects of the proposed action on these resources would be considered secondary, specifically the effects of temporary construction activities associated with the upgrade, repair, expansion, or replacement of all or parts of the McNair UDC systems.

Potential future utility infrastructure improvements, including expansion or upgrade of the UDC systems, would most likely have minor and temporary impacts on soils and local air quality due to fugitive dust and construction emissions. These effects would not be expected to be large, either singly or cumulatively. Additionally, deed restrictions that would be applied to all easements granted for existing utility lines would be expected to reduce foreseeable impacts to

(1) water supply and quality, (2) aquatic resources, and (3) cultural resources at Fort McNair. This reduction of impacts would be expected to reduce the overall cumulative impact to within reasonable limits.

Other proposed projects for Fort McNair include ongoing renovation of the National War College (Bldg. 61), construction of a new chapel, renovations of several Bldg. 30-and 40-series administrative buildings at the north end of the installation and implementation of an installation-wide Energy Savings and Performance Contract (ESPC). Environmental considerations for these projects have been addressed separately, and it is expected that these projects would comply with applicable Federal and District of Columbia laws and regulations. Best management practices would be expected to be implemented to control sediment, erosion, and fugitive dust for all Fort McNair projects. None of the proposed projects, in of themselves or in combination with the proposed action, would be expected to have any significant or cumulative adverse effects on any environmental resources on Fort McNair.

5.10.2 Impacts on the Human Environment

The privatization of the electric, natural gas, water, and wastewater distribution and collection systems may, in the worst-case scenario, result in the loss of several full-time-equivalent (FTE) personnel from the FMMC payroll. The FMMC DPWL oversees the operation and maintenance of facilities on both Fort Myer and McNair. FTE employees primarily assigned to support Fort McNair operations may be expected to either be reassigned within the DPWL workforce or be counseled as to where to apply for comparable employment, should no positions be available within the FMMC organization. It would be expected that the non-Federal entity would seek to employ those qualified individuals possessing knowledge of these systems and that any displaced individuals would have a first chance at obtaining comparable employment with no break in pay or benefits. In less than ideal conditions, some individuals would not be able to find suitable employment within the severance period. This situation, however, would not be permanent, and the cumulative economic impacts of temporary unemployment would not likely be significant.

6.0 CONCLUSIONS AND FINDINGS

This EA addressed the privatization of the electric, natural gas, water and wastewater utility distribution and collection (UDC) systems on the Fort McNair installation, part of the Fort Myer/McNair Military Community (FMMC). The proposed action and the no-action alternative have been reviewed in accordance with NEPA, as implemented by the regulations of the CEQ and AR 200-2. Baseline environmental and socio-economic conditions at Fort McNair and the immediate surrounding area have been described and the environmental and socio-economic consequences of implementing the proposed actions have been evaluated. A table summarizing the effects of the proposed action and the no-action alternative on environmental resources, as documented in detail in Section 5.0, is provided below.

Table 6-1: Summary of Effects of the Proposed Action and the No-Action Alternative

Resource	Proposed Action	No-Action Alternative
Land Use	No Impact.	No Impact.
Geology	No Impact.	No Impact.
Soils	No Impact.	No Impact.
Topography and Drainage	No Impact.	No Impact.
Climate	No Impact.	No Impact.
Air Quality	No Impact.	No Impact.
Water Quality	No Impact.	No Impact.
Aquatic Resources and Wetlands	No Impact.	No Impact.
Vegetation	No Impact.	No Impact.
Wildlife Resources	No Impact.	No Impact.
Threatened and Endangered Species	No Impact.	No Impact.
Prime and Unique Farmlands	No Impact.	No Impact.
Wild and Scenic Rivers	No Impact.	No Impact.
Cultural Resources	No Impact.	No Impact.
Hazardous, Toxic and Radioactive Substances	No Impact.	No Impact.
Infrastructure	No Impact.	No Impact.
Solid Waste	No Impact.	No Impact.
Transportation	Temporary, minor impacts.	No Impact.
Economics	Minor impacts.	No Impact.
Public Health and Safety	No Impact.	No Impact.
Noise	No Impact.	No Impact.
Environmental Justice	No Impact.	No Impact.

Department of Defense (DoD) has directed and Department of the Army (DA) has issued implementing guidance to major commands and subordinate installations to pursue privatization of UDC systems as a prudent means to transfer the responsibility of ownership, and operation and maintenance of these systems to the non-Federal sector. Privatization of UDC systems is envisioned as the means for the military services to obtain more efficient delivery of utility

services and to be able to standardize maintenance and operation of these systems as commonly applicable and prescribed in the non-Federal sector. Fort McNair's aging UDC system infrastructure is in need of repair, upgrade and/or replacement. Through privatization of its UDC systems, the Government would be able to effect these infrastructure improvements as timely as possible. For these reasons, the Government is pursuing privatization of its McNair UDC systems at this time.

Selection of the no-action alternative, or not privatizing the McNair UDC systems, would not satisfy the need to provide capital improvements to those entire existing systems or portions of those systems in poor condition, nor would it comply with DoD directives and DA policy to privatize UDC systems to the maximum extent. Therefore, the no-action alternative is not preferred.

Impacts to natural resources from implementing the proposed action would be expected to be minor, and be primarily associated with UDC systems infrastructure repair or replacement. Short-term impacts consisting of dust and emissions, soil disturbance, equipment noise and damage to vegetation can be expected within the utility line easements from the use of construction equipment. Implementing the proposed action would be expected to shorten the overall duration of construction activities that would have had to have been performed by the Government to keep the UDC systems in satisfactory operation. As such, no long-term impact and, collectively, no significant impact on natural resources is anticipated.

Impacts to cultural resources from implementing the proposed action would be expected to be minor, and temporary. No impacts are expected to historic structures, as no infrastructure work would be performed within any building footprint. Ground disturbance, even within existing utility easments, has the potential for uncovering archaeological or historically significant artifacts. The non-Federal owner would be required to comply with all installation guidelines and procedures for managing and protecting cultural resources prior to initiating any excavation or other disturbance of ground. As such, no significant impacts are expected to the architectural, visual and aesthetic features within the overall Fort McNair historic district.

Impacts to socio-economic conditions from implementing the proposed action would be expected to be minor, and associated with the potential loss of operations and maintenance personnel positions and minor impact of infrastructure construction expenditures. Privatization of the McNair UDC systems may result in the loss of up to six FTE personnel from the FMMC DPWL workforce. These individuals would be provided with job placement services available. Under ideal conditions, each individual would be able to find comparable employment with no break in pay or benefits. In less than ideal conditions, some individuals would not be able to find suitable employment within the severance period. This situation, however, is not permanent, and the cumulative economic impacts of temporary unemployment are not likely to be significant. Short-term increases in construction expenditures associated with infrastructure improvements on Fort McNair are not expected to represent a significant change in the local economy, considering the level of construction activity present and anticipated in the surrounding metropolitan area.

The implementation of the proposed action consists of transfer of ownership of McNair UDC systems, and transfer of responsibility to operate and maintain these systems, from the Federal Government to a non-Federal entity. Implementing the proposed action to privatize McNair UDC systems would not significantly alter baseline environmental or socio-economic conditions. Because the proposed action would not have a significant effect on the quality of the human environment, no environmental impact statement will be prepared, and a Finding of No Significant Impact will be published in accordance with 40 Code of Federal Regulations 1500 and Army Regulation 200-2.

7.0 REFERENCES

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8.0 LISTOF ACRONYMS AND ABBREVIATIONS

AAFES	Army-Air Force Exchange Service
ACHP	Advisory Council on Historic Preservation
ACM	Asbestos Containing Material
AR	Army Regulation
AST	Aboveground Storage Tank
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DCDES	District of Columbia Department of Environmental Services
DoD	Department of Defense
DPW	Directorate of Public Works
DRID	Defense Reform Initiative Directive
EA	Environmental Assessment
EPA	Environmental Protection Agency
ESPC	Energy Savings and Performance Contract
FAR	Federal Acquisition Regulation
FMMC	Fort Myer/McNair Military Community
FNSI	Finding of No Significant Impact
FTE	Full-Time-Equivalent
HTRS	Hazardous, Toxic and Radioactive Substances
ICUZ	Installation Compatible Use Zone
LBP	Lead-Based Paint
MDW	Military District of Washington
NCO	Non-Commissioned Officer
NCR	National Capital Region
NEPA	National Environmental Policy Act
NRT	National Response Team
NWI	National Wetland Inventory
O&M	Operation and Maintenance
OSHA	Occupational Safety and Health Administration
PA	Programmatic Agreement
PCB	Polychlorinated Biphenyl
PEPCO	Potomac Electric Power Company
POC	Point of Contact
PVC	Poly-Vinyl Chloride
SHPO	State Historic Preservation Office
UDC	Utility Distribution and Collection
USACHPPM	United States Center for Health Promotion and Prevention Medicine
USC	United States Code
USDA	United States Department of Agriculture
UST	Underground Storage Tank